

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 1997-239-C

IN RE:

Proceeding to Establish Guidelines for)	
an Intrastate Universal Service Fund)	
("USF") – Petition of the South Carolina)	PETITION TO INTERVENE
Office of Regulatory Staff for an Order)	
Implementing Provisions of Order No.)	
2016-22)	

Petitioner Sprint Spectrum, L.P. ("Sprint Wireless") by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Sprint Wireless to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of this petition, Sprint Wireless would show the Commission the following:

1. On June 27, 2016, the South Carolina Office of Regulatory Staff ("ORS") filed a Petition with the Commission for an order to implement Commission Order No. 2016-22 consistent with 2016 S.C. Acts 181 ("Act 181") effective January 1, 2017.

2. Sprint Wireless provides wireless voice telecommunications services in South Carolina. Pursuant to Order No. 2016-22 and Act 181, Sprint Wireless will be required to pay into the State USF. As such, Sprint Wireless has an interest in this proceeding, will be affected

by the outcome of this proceeding, and seeks to participate in this Docket in order to protect and pursue its interests.

3. While Sprint Communications Company, L.P. (“Sprint”) has been a party in this Docket for many years, Sprint Wireless files this Petition to Intervene out of an abundance of caution in order to ensure that its interests are protected.

4. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.

5. Sprint Wireless has not yet developed a position in this proceeding, but does not object to the relief sought by the ORS at this time.

6. Petitioner’s authorized representative in this proceeding is:

John J. Pringle, Jr., Esquire
Adams and Reese LLP
1501 Main Street, Suite 500
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7. Sprint Wireless asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, Sprint Wireless prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 1997-239-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ADAMS AND REESE LLP

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Attorneys for Sprint Spectrum, L.P.

August 15, 2016
Columbia, South Carolina

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day the **Petition to Intervene** via

U.S. Mail service as follows:

Robert E. Tyson, Jr., Esquire Sowell Gray Stepp & Laffitte, LLC PO Box 11449 Columbia, SC 29211 Anthony Mastando DeltaCom, Inc. (fka: ITCADeltaCom Communications, Inc., d/b/a ITCADeltaCom) 7037 Old Madison Pike, Ste. 400 Huntsville, AL 35806 <i>Representing ITC DeltaCom Communications</i>	Patrick W. Turner, Esquire BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina 1600 Williams St., Ste. 5200 Columbia, SC 29201 COLUMBIA 1280525v1 <i>Representing Bell South Telecommunications, Inc., d/b/a AT&T South Carolina and AT&T Communications of the Southern States</i>
Benjamin P. Mustian, Esquire Willoughby & Hoefer, P.A. PO Box 8416 Columbia, SC 29202 <i>Representing Celico Partnership d/b/a Verizon Wireless</i>	Sonia Daniels, Southern Region — AT&T External Affairs AT&T Corp. (fka: AT&T Communications of the Southern States, LLC) 1230 Peachtree, 4th Floor Atlanta, GA 30309 <i>Representing AT&T Communications of the Southern States</i>

<p>Bonnie D. Shealy, Esquire Robinson, McFadden & Moore, P.C. PO Box 944 Columbia, SC 29202 <i>Representing TW Telecom of South Carolina, LLC & Competitive Carriers of the South, Inc.</i></p>	<p>Nanette S. Edwards, Esq. Jeffrey M. Nelson, Esquire Office of Regulatory Staff 1401 Main Street, Ste. 900 Columbia, SC 29201 <i>Representing Office of Regulatory Staff</i></p>
<p>Burnet R. Maybank, III, Esquire Nexsen Pruet, LLC 1230 Main Street, Ste. 700 Columbia, SC 29201 <i>Representing Windstream South Carolina, Inc. (fka Alltel South Carolina, Inc.)</i></p>	<p>Scott Elliott, Esquire Elliott & Elliott, P.A. 1508 Lady Street Columbia, SC 29201</p> <p>AND</p> <p>Jeanne W. Stockman, Esquire Senior Corporate Counsel CenturyLink 14111 Capital Boulevard Wake Forest, NC 27587</p> <p>AND</p> <p>Zel Gilbert 1122 Lady St., St. 1050 Columbia, SC 29201</p> <p><i>Representing United Telephone Company of the Carolinas, LLC d/b/a CenturyLink</i></p>
<p>Craig K. Davis, Esq. Davis Law Firm 1524 Buck Hill Landing Road Ridgeway, SC 29130 <i>Representing South Carolina Office of Information Resources Budget & Control Board</i></p>	<p>Steven W. Hamm, Esquire Richardson Plowden and Robinson, P.A. PO Drawer 7788 Columbia, SC 29202</p> <p>AND</p> <p>Stan J. Bugner Verizon South, Inc. 1301 Gervais St., Ste. 825 Columbia, SC 29201</p>

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John M.S. Hoefer, Esquire Willoughby & Hoefer, P.A. PO Box 8416 Columbia, SC 29202-8416 <i>Representing Verizon Communications, Inc.</i>	Bradley S. Wright, Esquire M. John Bowen, Esquire Margaret M. Fox, Esquire McNair Law Firm, P.A. P. O. Box 11390 Columbia, SC 29211 <i>Representing the South Carolina Telephone Coalition</i>

s/Victoria H. Moody
Victoria H. Moody – Paralegal

August 15, 2016
Columbia, South Carolina